IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

DURA AUTOMOTIVE SYSTEMS, LLC, et al., | Case No. 19-12378 (KBO)

Debtors. (Jointly Administered)

Objection Deadline: February 24, 2020 at 4:00 pm (ET)

Hearing Date: March 2, 2020 at 10:00 am (ET)

NOTICE OF MOTION PURSUANT TO 11 U.S.C. § 362 FOR RELIEF FROM THE AUTOMATIC STAY

Nissan Motor Acceptance Corporation (the "Movant"), has filed a Motion (the "Motion"), pursuant to 11 U.S.C. §§ 105 and 362(d)(1), Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1, for entry of an order granting relief from the automatic stay imposed by 11 U.S.C. § 362.

HEARING ON THE MOTION WILL BE HELD ON MARCH 2, 2020 AT 10:00 AM (ET).

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(c)) to the attached Motion on or before **February 24, 2020 at 4:00 p.m.**

At the same time, you must also serve a copy of the response upon Movant's attorneys:

GELLERT SCALI BUSENKELL & BROWN LLC Ronald S. Gellert, Esq. Amy D. Brown, Esq. 1201 North Orange Street, Suite 300 Wilmington, DE 19801 (302) 425-5800

Movant respectfully requests that the hearing specified above be a final hearing.

The attorneys for the parties shall confer with respect to the issues raised by the Motion in advance of the hearing to determine whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

Dated: February 17, 2020 Wilmington, Delaware

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Amy D. Brown

Ronald S. Gellert, Esq. (No. 4259) Amy D. Brown, Esq. (No. 4077) 1201 North Orange Street, Suite 300 Wilmington, DE 19801

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